SUMMARY OF THE
QUALITY SYSTEMS COMMITTEE MEETING
APRIL 14, 2000

The Quality Systems Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Friday, April 14, 2000 at 1:00 pm Eastern Standard Time (EST). The meeting was lead by the committee's chair, Mr. Joe Slayton. A list of committee members and guests is given in Attachment A.

Review Action Items

- Committee was informed that ELAB had approached the NELAC Board of Directors with the proposal to drop 5.12.4 from the standard. ELAB was not satisfied with the Quality System Committee's efforts to date to call attention to the fact that this was legal chain of custody and was only upon special request of the client. The committee revisited the proposal to drop 5.12.4 from the standard and decided not to remove it for the following reasons:

    1. NELAC's scope is compliance monitoring, i.e., analyses done under SDWA; CWA; CAA; CERCLA; RCRA, etc. Of all the environmental analyses associated with compliance monitoring only a very small fraction involves analyses in preparation for litigations. However, such analyses are part of regulatory analyses and some feel a very important component.

    2. State requirements and interpretation of legal chain of custody vary. The NELAC standard clarifies the requirements and assure consistency.

    3. If the Quality System Committee proposed to drop section 5.12.4, the committee feels that it will not carry the majority vote at NELAC VI and all the clarifying language that has been developed over the last year to improve sections 5.12.3 and 5.2.4 will be lost as the standard reverts back to that of July 1, 1999.

- Mr. Slayton will update Chapter 5 to reflect changes relative to Sample Tracking and Legal Chain of Custody Procedures. The latter to become a new appendix E (still part of standard). This will require changes to:
    - Table of Contents
    - Glossary (3 new definitions were discussed)
    - Update 5.12.4 (Appendix E) with an introductory paragraph (written to introduce the new glossary terms (Legal Chain of Custody Protocols; Chain of Custody Form; and Sample Tracking)
    - Change all references to 5.12.4 to Appendix E
    - Change current Appendix E to F.

- Mr. Slayton will fax latest microbiology comments from California to Ms. Bruch.

- Mr. Slayton to update radiochemical testing appendix and the full committee will review D.4.4 (calibration) with regard to 5.9.4.2.

- Mr. Slayton will update Chapter 5 to reflect changes made relative to comments:

A. Parking lot item #1

Mr. Slayton to search Chapter 5 for the term "will" and consider replacing with "shall" or "must". It was decided that the expression "Such as" will remain just as "e.g.," as material added to clarify the standards.

B. Comments on D.1 (LCS, MS) from NELAC July 1999. Eastman Kodak (Don Zahniser):

Mr. Slayton will change D.1.1.b.2 to clarify that the frequency of MS/LCS is one per batch of 20 samples. The commentor questioned having requirements that were not consistent with the CFR. The committee does not agree and prefers the more stringent idea. The committee did agree that the standards should not require that the LCS be from a source separate from the calibration standards. This has been captured in the proposed change to the LCS definition in the glossary. The commentor expressed concern about 200.7 requirements relative to Chapter 5 D.1 (one check standard at multiple concentrations vs. two concentrations at the same concentration). The committee felt that this is covered by the scope of chapter 5: "If it is not clear which requirements are more stringent, the standard from the method or regulation is to be followed." When it is not apparent which is more stringent-Chapter 5 or the CFR, the CFR and mandated method take precedence.

C. Test America, Paul Juno (note: most of this set of comments were addressed at the 1/17/99 committee meeting.)

Issue of recording analysis time.The committee agreed with the comment. Mr. Slayton will update Chapter 5: change 48 hours to 72 hours in 5.13.7 and change the record requirement in 5.12.3.3 to specify recording of time only if regulatory holding time is less than or equal to 72 hours.

A second comment concerned quantitation limits. The Quality Systems Committee feels they have addressed this with the proposed change to Quantitation Limit definition for the glossary, i.e., concern for both values below the calibration and above the calibration range.

The third comment requested additional clarification on frequency of QC

and a concern that D.1.1 appears to allow for no LCS or MS if there is not an extraction or preparation procedure. Mr. Slayton will update Chapter 5 with additional text before "batch" in all locations in D.1.1 where "batch" is used.

D. Comments "A" from Safety-Kleen Corp (Vincent Donndelinger): Issue of necessity for second source material for LCS. The committee agrees. This has been proposed as a change to the definition of LCS.

E. California (June Kani): It is not clear if last 1/3 of the comments (all microbiology related) had been discussed by the committee. Ms. Kani sent additional comments 4/14/00 which Mr. Slayton forwarded to Ms. Bruch for consideration on 4/17.

F. Davis & Floyd Eng. (Carl Burrell): Need for greater clarification between routine sample tracking and legal COC and the overlapping form routinely used by both processes to track samples from the field to the lab. The committee agrees and what is being proposed has already been added to the standard for consideration at NELAC VI.

G. QC-Inc. (Heidi Krueger): Requested more clarification of "speciality area" in the description of work cells in 5.10.2.1.g. The committee agrees and has made changes to this section to add further clarification.

Attachment A

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Quality Systems Committee
April 14, 2000

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